

ZAGER FUCHS, P.C.
Michael T. Warshaw, Atty.#: 005171976
119 Avenue at the Commons, Suite 4
Shrewsbury, New Jersey 07702
Phone: (732)747-3700
Fax: (732) 758-9068
Email: mwarshaw@zagerfuchs.com
Attorneys for Defendant ACU Plasmold, Inc. LOCAL COUNSEL

Edward W. Miller, Esq.
821 Franklin Ave., Suite 209
Garden City, NY 11530
Telephone: (917) 770—9016
Email: edmillerlaw@gmail.com
Attorneys for Defendant ACU Plasmold, Inc., TRIAL COUNSEL

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

VISION INDUSTRIES GROUP, INC.,

Plaintiff,

Case No. 2:18-cv-6296 (ES) (CLW)

-- against --

ACU PLASMOLD, INC., ABC
COMPANIES 1-10 and XYZ
CORPORATIONS 1-10,

Defendants

**DECLARATION OF MICHAEL T.
WARSHAW IN SUPPORT OF
DEFENDANT ACU PLASMOLD, INC.,
MOTION TO STRIKE EXPERT
DECLARATIONS OF MARK
LANTERMAN, EXCLUDE
LANTERMAN'S TESTIMONY, VACATE
MAGISTRATE JUDGE CATHY
WALDOR ORDER FOR SANCTIONS
(Doc 266), AND TO DISMISS WITH
PREJUDICE THE REMAINING ISSUES
ON PLAINTIFF'S MOTIONS FOR
SANCTIONS (Doc 104; 124; 224).**

I, Michael T. Warshaw, an attorney duly admitted to practice in the State of New Jersey, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a partner at the firm Zager Fuchs, P.C., Local Counsel for Defendant, ACU Plasmold (ACU) in the within matter. I am familiar with the facts and circumstances of this action. I make this declaration in support of ACU's motion to strike Expert Declarations of Mark Lanterman, exclude Lanterman's testimony, Vacate Magistrate Judge Cathy Waldor Order for Sanctions (doc 266), and to dismiss with prejudice the remaining issues on plaintiff's Motions for Sanctions (doc 104; 124; 224).
2. In support of ACU's Motion, attached hereto are true and correct copies of the exhibits identified therein.
3. Attached as **Exhibit 1** are relevant pages from the transcript of the video recorded and transcribed remote zoom deposition of Mark Lanterman, taken on February 11, 2025.
4. Attached as **Exhibit 2** is an article from the New York Times regarding Upsala College, titled "After a Century, Upsala Will Close Without Cash Rescue, dated March 3, 1995.
5. Attached as **Exhibit 3** is an article from the New York Times regarding Upsala College, titled "In Brief: The Doors Are Closed At Upsala College," dated June 4, 1995.
6. Attached as **Exhibit 4** is the Felician University web page regarding Upsala College Transcripts, available at <https://felician.edu/academics/office-of-the-registrar/upsala-transcripts/>.

7. Attached as **Exhibit 5** is an email chain ending January 16, 2025, between the Felician University's registrar's office to Perkins Coie LLP regarding a request for Mark Lanterman's purported transcripts.
8. Attached as **Exhibit 6** is a copy of Upsala University's 1987 Upsalite yearbook, obtained from Perkins Coie LLP staff who accessed and copied same at the East Orange Public Library, located in East Orange.
9. Attached as **Exhibit 7** is a copy of Upsala University's 1988 Upsalite yearbook, obtained from Perkins Coie LLP staff who accessed and copied same at the East Orange Public Library, located in East Orange.
10. Attached as **Exhibit 8** is a copy of Upsala University's 1989 Upsalite yearbook, obtained from Perkins Coie LLP staff who accessed and copied same at the East Orange Public Library, located in East Orange.
11. Attached as **Exhibit 9** is a copy of Upsala University's 1990 Upsalite yearbook, obtained from Perkins Coie LLP staff who accessed and copied same at the East Orange Public Library, located in East Orange.
12. Attached as **Exhibit 10** is Upsala University's 1987 commencement program, provided to Zager Fuchs by Perkins Coie, who obtained same from the archivist at the Swenson Swedish Immigration Research Center at Augustinian College in Rock Island, Illinois, where the program and other Upsala records are preserved.
13. Attached as **Exhibit 11** is Upsala University's 1988 commencement program, provided to Zager Fuchs by Perkins Coie, who obtained same from the archivist at

the Swenson Swedish Immigration Research Center at Augustinian College in Rock Island, Illinois, where the program and other Upsala records are preserved.

14. Attached as **Exhibit 12** is Upsala University's 1989 commencement program, provided to Zager Fuchs by Perkins Coie, who obtained same from the archivist at the Swenson Swedish Immigration Research Center at Augustinian College in Rock Island, Illinois, where the program and other Upsala records are preserved.
15. Attached as **Exhibit 13** is Upsala University's 1990 commencement program, provided to Zager Fuchs by Perkins Coie, who obtained same from the archivist at the Swenson Swedish Immigration Research Center at Augustinian College in Rock Island, Illinois, where the program and other Upsala records are preserved.
16. Attached as **Exhibit 14** are relevant Excerpts of the University of Minnesota 1985-96 student-Staff Directory, available at the University of Minnesota website at <https://conservancy.umn.edu/items/e9d2b595-1b72-44fe-a2ba-eefcbe3db5f>.
17. Attached as **Exhibit 15** are relevant excerpts of Lanterman's transcribed sworn May 2, 2017 deposition testimony in the matter of Lanterman v. Stillman, Minnesota Department of Human Services, Civil Fil No. 27-CV-16-10860, Minn. 4th Jud. Dist. Ct.
18. Attached as **Exhibit 16** is an email chain ending on February 13, 2025, between Lanterman and Michael Pitkow, Chief of the Springfield Township, Pennsylvania Police Department.
19. Attached as **Exhibit 17** is an email chain ending on February 28, 2025, between Lanterman and Chief Pitkow.

20. Attached as **Exhibit 18** is an email dated April 3, 2025 from the chief now confirming that Lanterman's personnel records have not been returned.
21. Attached as **Exhibit 19** are relevant portions of the March 12, 2025 findings of fact, conclusions of law and order for judgment in the matter entitled Lanterman V. Afremov, civil file no. 27-CV-12-22089, Minn. 4th Jud. Dist. Ct.
22. Attached as **Exhibit 20** are relevant excerpts of Lanterman's transcribed sworn May 6, 2022 deposition testimony in the matter of Tumey v. Mycroft AI, Inc., Case No. 4:21-cv-00113, W.D. Mo.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 11, 2025

/s/Michael T. Warshaw
ZAGER FUCHS, P.C.
Michael T. Warshaw, Atty.#: 005171976
119 Avenue at the Commons, Suite 4
Shrewsbury, New Jersey 07702
Phone: (732)747-3700
Fax: (732) 758-9068
Email: mwarshaw@zagerfuchs.com
Attorneys for Defendant ACU Plasmold, Inc. LOCAL COUNSEL